

# Occidental Chemical Corporation

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July 12, 1985

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Mr. Paul Foersch, P.E.  
Senior Sanitary Engineer  
NYS Dept of Environmental Conservation  
600 Delaware Avenue  
Buffalo, New York 14202

Dear Mr. Foersch:

RE: Request for Information from Meeting of June 10, 1985

On June 10, 1985, we met over a proposed consent order covering SPDES Permit NY0003336. The following information is submitted to fulfill Schedule A.

## 1. F-Area

The attached report entitled "Construction Report F-Area Sewer Severance, June 5, 1985" details remedial measures conducted as a result of the contaminant infiltration into Outfall 005 in February and March 1985. Approximately \$60,000 was spent to remediate this situation. Table 1 shows MCT/Toluene results from January thru April. There was a significant drop in loading once the plugs were installed. It is expected that this trend will continue.

With respect to a closeout plan for the F-Area, the following is planned.

1. A liner will be installed in Outfall 005 under conditions contained in our current SPDES Permit and the associated consent order. This is documented in our Engineering Reports to NYSDEC of 12/15/84 and 5/13/85.
2. We will continue to monitor the outfall as required by the SPDES Permit and by grab IR analysis or equivalent methods, in order to detect any organic increase in a timely fashion.
3. The MCT process in the F-Area, is expected to shutdown by December 31, 1985, if the startup of the new MCT plant remains on schedule.
4. By April 30, 1986, we will remove materials contained in the F-Area MCT process equipment, sumps, and dikes. These materials will be recovered or disposed of following procedures contained in SOP 6d, which is attached.



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## 2. N-Area

The new MCT facility in N-Area is an improvement over the current F-Area process and incorporates the following with respect to improvements in the water area.

1. Spill control for all process vessels.
2. The elimination of a carbon block condenser which historically resulted in a problem in F-Area.
3. Immediate use of the N-Area cooling tower on the following units which were formerly cooled by river water:
  - o TDC Condenser
  - o DCT Condenser
  - o TRC OH Condenser
  - o Muriatic Acid Cooler
  - o Acid Plant Condenser
  - o Refrigeration Condenser

Until the action described in #4 below is completed, the following administrative controls are planned to monitor the heat exchangers not on the cooling tower:

- i. Sample taps will be provided on the heat exchangers and samples of the cooling water discharge visually examined by Operations personnel for signs of NAPL (non aqueous phase liquid).
  - ii. The discharge from the process building to the outfall will be monitored daily by infrared analyses or the equivalent, to detect organics leaks.
  - iii. An LEL meter will be installed as a secondary measure. We are also investigating the use of an organic vapor analyzer which is much more sensitive than LEL.
4. By fourth quarter 1986, the N-Area cooling tower will be expanded such that all cooling requirements for heat exchangers and other vessels containing organic process fluids will be supplied via cooling tower. There will be no cooling water discharge to the outfall from any heat exchanger or other process vessel which contains organic process fluids and thus, discharges of organics to the outfall from process vessel failures in the N-Area will be completely prevented. The cost of this cooling tower expansion will be approximately \$400,000. We feel that this closed-loop system is a definite positive step toward protection of the environment and represents the best engineering solution to the prevention of discharges from process vessel failures.



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This letter should fulfill the items raised in the Consent Order. Should you required additional information, please contact me at 278-7534.

Very truly yours,

James J. Czapla  
Supt Environmental Control

/ddb  
NYSDEC



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Table 1  
MCT & TOLUENE

<u>Month</u>	<u>OUTFALL 005</u>		<u>TOTAL OUTFALLS</u>	
	<u>MCT</u> <u>lb/D</u>	<u>Toluene</u> <u>lb/D</u>	<u>MCT</u> <u>lb/D</u>	<u>Toluene</u> <u>lb/D</u>
January 1985	36	5.6	40	5.9
	30	3.3	34	5.5
Feb-Mar 1985 Avg	136	18	143	19
April 1985	2.8	.95	6.9	1.1
	.68	.23	2.3	.29
% Reduction Over Feb-Mar	~98-99.5	95		
% Reduction over base case January	93	85 plus		